

Young Conaway Stargatt & Taylor, LLP

Rockefeller Center
1270 Avenue of the Americas
Suite 2210
New York, NY 10020
Telephone: (212) 332-8840
Facsimile: (212) 332-8855
Matthew B. Lunn
Justin P. Duda

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,
v.

THE MELVIN N. LOCK TRUST,

THE SYLVIA W. LOCK DECLARATION OF
TRUST, DATED APRIL 13, 1982,

THE ESTATE OF SYLVIA W. LOCK,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05410 (SMB)

NORTHERN TRUST, N.A., F/K/A NORTHERN TRUST BANK OF FLORIDA, N.A., a National Association, in its capacity as Personal Representative of the ESTATE OF SYLVIA W. LOCK, in its capacity as Trustee of THE SYLVIA W. LOCK DECLARATION OF TRUST, DATED APRIL 13, 1982, and in its capacity as Trustee of the MELVIN N. LOCK TRUST,

LORRAINE LOCK NOSWORTHY,

AMANDA GOLDBERG SYNDERMAN,

JEREMY GOLDBERG,

ELENA ELKIN,

JOSHUA ELKIN,

FREDERICK GOLDBERG,

ALYSSA GOLDBERG,

MEREDITH GOLDBERG,

JOAN ELKIN MADISON,

SUSAN SIEGAL,

PAMELA W. GOLDBERG, and

JAMES NOSWORTHY,

Defendants.

STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL WITH PREJUDICE OF ADVERSARY PROCEEDING

Irving H. Picard (the “Trustee”) as trustee for the liquidation of the business of Bernard L Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the substantively consolidated estate of Bernard L. Madoff, by and through his undersigned counsel, and Defendants The Melvin N. Lock Trust; The Sylvia W. Lock

Declaration Of Trust, Dated April 13, 1982; The Estate of Sylvia W. Lock; The Northern Trust Company, successor by merger to Northern Trust, N.A., f/k/a Northern Trust Bank of Florida, N.A., not individually but in Its Capacity as Personal Representative of The Estate of Sylvia W. Lock, in Its Capacity as Trustee of the Sylvia W. Lock Declaration of Trust, Dated April 13, 1982, and in Its Capacity as Trustee of The Melvin N. Lock Trust ("Northern Trust"); Lorraine Lock Nosworthy; Amanda Goldberg Synderman; Jeremy Goldberg; Elena Elkin; Joshua Elkin; Frederick Goldberg; Alyssa Goldberg; Meredith Goldberg; Joan Elkin Madison; Susan Siegal; Pamela W. Goldberg; and James Nosworthy (collectively, the "Defendants"), by and through their undersigned counsel, hereby stipulate and agree to the following:

In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(A)(ii) and Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Trustee and the Defendants hereby stipulate to a dismissal with prejudice of the Trustee's claims against the Defendants in the above-captioned adversary proceeding without costs to either the Trustee or the Defendants.

Dated: September 30, 2015

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

By: /s/ Matthew B. Lunn
Matthew B. Lunn
Justin P. Duda
Rockefeller Center
1270 Avenue of the Americas, Suite 2210
New York, New York 10020
Telephone: (212) 332-8840
Facsimile: (212) 332-8855
Email: mlunn@ycst.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC*

NORTON ROSE FULBRIGHT US LLP

By: /s/ David A. Rosenzweig
David A. Rosenzweig
666 Fifth Avenue
New York, New York 10103-3198
Telephone: (212) 318-3400
Facsimile: (212) 318-3400
Email: drosenzweig@fulbright.com

*Attorneys for The Northern Trust Company,
successor by merger to Northern Trust,
N.A., f/k/a Northern Trust Bank of Florida,
N.A., not individually but in Its Capacity as*

WARNER & SCHEUERMAN

By: /s/ Jonathon D. Warner

Jonathon D. Warner
6 West 18th Street, 10th floor
New York, NY 10011
Telephone: (212) 924-7111
Facsimile: (212) 924-6111
Email: jdwarner@warnerandscheuerman.com

*Personal Representative of The Estate of
Sylvia W. Lock, in Its Capacity as Trustee of
the Sylvia W. Lock Declaration of Trust,
Dated April 13, 1982, and In Its Capacity as
Trustee of The Melvin N. Lock Trust*

*Attorneys for Lorraine Lock Nosworthy,
Amanda Goldberg Snyderman s/h/a
Snyderman, Jeremy Goldberg, Elena Elkin,
Joshua Elkin, Frederick Goldberg, Alyssa
Goldberg, Meredith Goldberg, Joan Elkin
Madison, Susan Siegal, Pamela W. Goldberg
and James Nosworthy*